

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

METSO PAPER USA, INC.,	:	Civil Action No. 3:CV-08-47
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
GENERAL ELECTRIC COMPANY,	:	
	:	
Defendant.	:	

AFFIDAVIT OF HARRI K. KYTOMAA

I, Harri K. Kytomaa, hereby state:

1. All of the opinions that I expressed in my report and in my deposition were expressed to a reasonable degree of engineering certainty.
2. The plaintiff seeks in its motion to exclude my opinions because it claims that I “relied on controlled laboratory testing conducted by GE and other lighting manufacturers inapplicable to the facts relative to this loss.” I am not sure what the plaintiff is referring to, but I have not relied on any undisclosed testing performed by GE or other lighting manufacturers in my report. The plaintiff may have intended to refer to my work that was done as a consulting expert on another matter and, to my knowledge, has not been disclosed. I did not rely on that work in connection with the Metso case and it is not relevant to the opinions I have expressed in the Metso case.

Signed under the penalties of perjury.



Harri K. Kytomaa, PhD, PE

Date: March 28, 2011